

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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DENNIS J. DONOGHUE and	:	
MARK RUBENSTEIN,	:	
	:	
Plaintiffs,	:	
v.	:	No. 1:23-cv-04985 (JHR)(VF)
	:	
AMC ENTERTAINMENT HOLDINGS, INC.,	:	<b>STIPULATION AND</b>
	:	<b>PROPOSED ORDER</b>
Nominal Defendant,	:	
	:	
and	:	
	:	
ANTARA CAPITAL MASTER FUND L.P.,	:	
ANTARA CAPITAL FUND GP L.L.C.,	:	
ANTARA CAPITAL L.P.,	:	
ANTARA CAPITAL GP L.L.C. and	:	
HUMANSHU GULATI,	:	
	:	
Defendants.	:	
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Plaintiffs Dennis J. Donoghue and Mark Rubenstein, nominal defendant AMC Entertainment Holdings, Inc. ("AMC"), and defendants Antara Capital Master Fund, L.P., Antara Capital Fund GP L.L.C., Antara Capital L.P., Antara Capital GP L.L.C., and Himanshu Gulati (the "Antara Defendants"), by their respective undersigned counsel, hereby state as follows:

WHEREAS, Plaintiffs filed the First Amended Complaint (ECF No. 4) in this action in this Court on July 19, 2023; and

WHEREAS, the Antara Defendants agreed to accept service of the summons and First Amended Complaint through their attorneys on July 31, 2023; and

WHEREAS, AMC agreed to accept service of the summons and First Amended Complaint through its attorneys on August 1, 2023; and

WHEREAS, in exchange for agreeing to accept service of summons of the First Amended Complaint without requiring Plaintiffs to formally serve, Plaintiffs, AMC, and the Antara Defendants have agreed to an extension of the time for AMC and the Antara Defendants to file any response to the First Amended Complaint in this case; and

WHEREAS, Plaintiffs, AMC, and the Antara Defendants acknowledge that such extension will serve the interests of judicial economy and will conserve the time, money, and resources of all parties;

THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel, that nominal defendant AMC and the Antara Defendants shall not be required to file any response to the First Amended Complaint in this case until September 29, 2023.

*[Remainder of page intentionally blank]*

Dated: New York, New York

August 1, 2023

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*Counsel for AMC*

So Ordered:

\_\_\_\_\_  
*Honorable Jennifer H. Rearden USDJ*

Dated: New York, New York  
August 1, 2023

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So Ordered:

Honorable Jennifer H. Rearden USDJ